## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

No. 13-10200-GAO

v.

DZHOKHAR TSARNAEV

## MOTION FOR LEAVE TO FILE CERTAIN EXHIBITS TO MOTION TO SUPPRESS ELECTRONICALLY STORED INFORMATION $\underline{\text{UNDER SEAL}}$

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file certain exhibits to his motions to suppress physical evidence – specifically, search warrant applications and the search warrants themselves - under seal.

As grounds therefor, undersigned counsel state that the documents are not part of the public record, refer to investigative information, and are covered by the protective order in this case. DE #91.

Respectfully submitted,

DZHOKHAR TSARNAEV by his attorneys

/s/ Timothy Watkins

Judy Clarke, Esq. California Bar: 76071 CLARKE & RICE, APC 1010 Second Avenue, Suite 1800 San Diego, CA 92101 (619) 308-8484 David I. Bruck, Esq. (SC Bar # 967) 220 Sydney Lewis Hall Lexington, VA 24450 (540) 460-8188

Miriam Conrad, Esq. (BBO # 550223) Timothy Watkins, Esq. (BBO # 567992) William Fick, Esq. (BBO # 650562) FEDERAL PUBLIC DEFENDER OFFICE 51 Sleeper Street, 5th Floor (617) 223-8061

## **Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 12, 2014.

/s/ Timothy Watkins